

Motion To Amend Complaint
 Court Case Number: 07-636-SLR ORIGINAL

Requesting the letter of job termination to be added to Court Case Number: 07-636, to add other defendants as follow:

1. Vincent P. Meconi, Secretary
2. Dana J. Jefferson, Ph. D.
3. Kathleen Testa
4. Loretta Brase, EEO/Affirmative Action Officer
5. Kathie Gibson
6. Charles Hayward, Director, Division of Child Support Enforcement
7. Midge Holland, Chief of Administration, Division of Child Support Enforcement
8. Daniel Minnick, Sr. Administrator, Division of Child Support Enforcement
9. Eschalla Clarke, Administrative Sp. II, Supervisor, Division of Child Support Enforcement
10. Heather Morton, Manager, Division of Child Support Enforcement
11. Kelly A. Langley, Manager, Division of Child Support Enforcement

Address: State of Delaware, DHSS-Div. of Child Enforcement
 1901 N. Dupont Hwy
 New Castle, DE 19720

CLERK, U.S. DISTRICT COURT
 DISTRICT OF DELAWARE
 FILED
 2007 DEC -3 AM 11:30

Janet Daylor
 12-03-2007

07-1034



**DELAWARE HEALTH
AND SOCIAL SERVICES**
OFFICE OF THE SECRETARY

 **ORIGINAL**

FILED
CLERK, U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2007 DEC -3 AM 11:32

ACCOUNT #949106977
PNC BANK

NOV 15 P 4:09
FOR DEPOSIT ONLY
TO THE CREDITORS
DCSE

November 14, 2006

HAND DELIVERED

Ms. Jannette Saylor
29 East 23rd Street
Wilmington, DE 19802

Dear Ms. Saylor:

This letter shall serve as official notice that you are being dismissed from your probationary position of *Administrative Specialist I*, in the Division of Child Support Enforcement (DCSE), Department of Health and Social Services (DHSS), for ongoing unsatisfactory job performance. The following information summarizes the basis for this action.

On November 28, 2005, you began working in the DCSE Accounting Section, in New Castle County. In March 2006, you became a member of the new Administrative Support Services Unit, which was created in the Accounting Section. As a member of this unit your responsibilities included providing reliable support coverage for the section administrator and the various units in the Accounting Section. You were expected to approach all work assignments promptly, prioritize them according to urgency, and complete them by the scheduled deadlines. You were required to draft minutes within five days of the meeting, and in compliance with approved formats. You were also to coordinate with staff to assure effective operational functions. In spite of training, repeated supervisory coaching and numerous meetings regarding your job responsibilities, your work remains unsatisfactory.

For example, you are unable to generate acceptable minutes for scheduled staff meetings; you have ongoing difficulty interpreting written and oral communication; you fail to provide timely and effective project updates to your supervisor; and you are unable to complete your work with acceptable accuracy. You are unable to efficiently prioritize your workflow, and as a result, tasks were removed from your assigned duties and completed by your supervisor. In March 2006, your supervisor advised you to reorganize your work station in an effort to decrease the clutter, and you were provided with the necessary tools to assist you with this effort (stackable trays, desk organizers, etc.). On May 30, 2006, your supervisor asked for a small stack of job interview letters with which you had been working. You were initially unable to locate them, and after approximately ten minutes, you found the letters and delivered them to your supervisor.

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You have also demonstrated inappropriate interpersonal communications with your supervisor. On May 9, 2006, in a hostile confrontation, you refused to track your workflow and productivity for tax notices. On June 14, 2006, you engaged in a verbal altercation regarding a training class you had attended on recording meeting minutes. On June 21, 2006, you became loud and disruptive when your supervisor suggested a method for organizing the records in an archiving project. On July 6, 2006, you received a written warning that the type of behavior you exhibited on June 21, 2006, was unacceptable, and if repeated, could lead to disciplinary action. On October 12, 2006, you again engaged in a loud verbal interaction with your supervisor, disputing the relevance of a prearranged deadline, and demanding that she ~~send you written~~ FOR DEPOSITION
TO THE
SUSPECT instructions specifying the new deadline.

Your supervisor met with you on the following dates to discuss ~~your~~ performance problems, to offer guidance, to reiterate instructions and to provide training.

February 16, 2006 April 28, 2006

July 21, 2006

October 10, 2006

March 14, 2006

May 4, 2006

August 14, 2006

October 13, 2006

March 22, 2006

June 16, 2006

August 24, 2006

April 26, 2006

June 30, 2006

September 20, 2006

ACCOUNT #94010377
PNC BANK

These meetings failed to produce the necessary improvement in your job performance, and you were advised in the meeting on September 20, 2006, that failure to improve would result in a recommendation for your dismissal during probation.

Your continued failure to comply with supervisory instructions, your inability to perform your job duties, and your repeated outbursts of disrespectful behavior, represent unsatisfactory job performance. Your supervisor has given you performance feedback, provided relevant training and given you many opportunities to improve, all to no avail.

Your dismissal from the position of probationary *Administrative Specialist I* is effective as of the date of this letter.

Sincerely,



Vincent P. Meconi
Secretary

pc: Dana J. Jefferson, PH.D.
 Charles E. Hayward
 Kathleen Testa
 Loretta Brase
 Kathie Gibson